

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10

1200 Sixth Avenue, Suite 900 Seattle, WA 98101-3140

OFFICE OF ECOSYSTEMS, TRIBAL AND PUBLIC AFFAIRS

August 12, 2013

Frank Roberts Thorne Bay Ranger District P.O. Box 19001 Thorne Bay, Alaska 99919

Re:

EPA comments on the US Forest Service Big Thorne Project Final Environmental Impact

Statement and Record of Decision, EPA Project #11-010-AFS.

Dear Mr. Roberts:

Thank you for the opportunity to review the Final Environmental Impact Statement and Record of Decision for the Big Thorne Project, Prince of Wales Island in southeast Alaska (CEQ #20130201). We have reviewed the EIS in accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act.

We previously rated the Draft EIS EC-1 (Environmental Concerns-Adequate Information and noted that the alternatives found a reasonable balance between the need to provide a local, economic supply of timber and consideration of the various resources and issues identified in the Forest Management Plan, as well as those concerns identified in the scoping process. We also recognized that the project would support the local timber industry in an area with extensive, existing infrastructure to extract and process the timber. We identified our concerns with Alternative 2 in that it focused primarily on supply and minimized the protections or considerations of other resources.

The Final EIS and ROD identify Alternative 3, with modifications (additional uneven harvest, seasonal closure of core habitat for wolf sustainability, no changes to Old Growth Reserves to maintain connectivity, etc.), as the Forest Service's preferred alternative. While this alternative is not what we previously determined to be the environmentally preferable alternative (Alternative 4, also identified as environmentally preferable in the ROD), and is the alternative with the highest miles of road construction and harvest volumes, we believe that Alternative 3 does provide for robust mitigation for resources through the incorporation of extensive Resource Protection Measures and Best Management Practices while providing an economical project for local industry.

We do remain concerned about the identified short-term water quality impacts due to sediment transport and loading as well as the potential short- and long-term impacts to subsistence deer hunting. The Final EIS and ROD have appropriately identified these concerns and identified specific mitigation measures to address these impacts. We encourage strict implementation of the monitoring identified in the ROD to evaluate these and other impacts (particularly to water quality and subsistence), and usage of this information to modify the project as needed.

Again, we appreciate the opportunity to offer comments on the Final EIS. Please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or you may contact Jennifer Curtis of my staff in Anchorage at (907) 271-6324 or at curtis.jennifer@epa.gov with any questions you have regarding our comments.

Sincerely,

Christine B. Reichgott, Manager

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Environmental Review and Sediments Management Unit